

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Case No. 5:22-CV-00068-BO

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

**DEFENDANT CITY OF RALEIGH'S  
MOTION TO ALLOW EXCESS  
CARRIER TO ATTEND SETTLEMENT  
CONFERENCE BY VIRTUAL MEANS**

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NOW COMES Defendant City of Raleigh (“the City”), by and through undersigned counsel, and hereby respectfully requests that representatives of Lloyd’s London, the City’s excess insurance carrier, be allowed to attend the upcoming Court-hosted settlement conference remotely via telephone and/or video conference. In support of this Motion, the City shows the Court the following:

1. A court-hosted settlement conference before the Honorable United States Magistrate Judge Robert B. Jones, Jr. is scheduled to be held on Monday, August 15, 2022, at 9:30 a.m. in Wilmington, North Carolina (DE #70). The undersigned counsel and a City representative will be present in person for the mediation, as required by applicable rules.

2. Robbie Vaughan, Senior Manager – Claims with RiverStone International, is a representative of the City’s excess insurance carrier, Lloyd’s, London, and plans to participate in the settlement conference. RiverStone and Senior Manager Vaughan are located in Brighton, East Sussex, United Kingdom. They have asked to participate in the conference by remote means.

3. Given the travel distance and current COVID-19 conditions, travel imposes a

hardship on Senior Manager Vaughan.

4. The undersigned counsel has consulted with Plaintiffs' counsel regarding this Motion and Plaintiffs' counsel has consented to remote appearance for the excess carrier's representatives.

5. Should the Court grant this Motion, the undersigned will arrange for representatives appearing on behalf of Lloyd's, London to attend the conference by telephonic or video means for as long as the Court requires.

6. The City respectfully submits that the spirit and intent of the court-hosted settlement conference can be fully and adequately met through the telephonic or video attendance of the representative from its excess insurance carrier, and no party will be prejudiced by this representative's attendance at the conference by virtual means.

WHEREFORE, for the foregoing reasons, Defendant City of Raleigh hereby respectfully requests permission for representatives of the City's excess carrier to attend the settlement conference set for August 15, 2022, at 9:30 a.m. by virtual means.

Respectfully submitted, this the 2d day of August, 2022.

**CITY OF RALEIGH**  
**Robin L. Tatum, City Attorney**

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Raleigh, Chief of Police Estella  
Patterson, and City Manager  
Marchell Adams-David*

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Respectfully submitted,

**CITY OF RALEIGH**  
**Robin L. Tatum, City Attorney**

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